

REPORT

2023 Annual CCR Landfill Inspection Report Byproduct Storage Area B St. Johns River Power Park

Submitted to:

JEA/St. Johns River Power Park

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INTRODUCTION

WSP USA Inc. (WSP) conducted the coal combustion residual (CCR) landfill annual inspection for Byproduct Storage Area B (BSA-B) at the St. Johns River Power Park (SJRPP). The inspection, conducted on December 15, 2023, and this report are intended to meet the requirements of 40 CFR §257.84. WSP's inspection was performed by Samuel Stafford, PE.

The Phase I development of BSA-B is located approximately 1.5 miles northeast of the former SJRPP main entrance in northeastern Duval County, Jacksonville, Florida (see Figure 1, below).

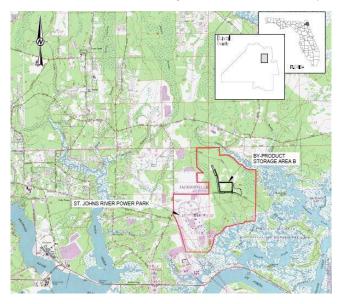


Figure 1: Site Location Map

REVIEW OF AVAILABLE INFORMATION

In accordance with §257.84(b)(1), WSP reviewed the available information regarding the status and conditions of BSA-B including operating record documents. The documents reviewed included:

- Technical Submittal, Hydrogeological and Geotechnical Site Evaluation, Conceptual Design Drawings, dated April 2007 (including associated responses to comments).
- Area B Byproduct Storage Area Phase I Operations Plan, September 2014.
- Closure Design Plan, Byproduct Storage Area B, May 2019.
- Run-on and Run-off Control Plan, Byproduct Storage Area B, October 2021.
- Operating records: SJRPP inspection reports.

INSPECTION SUMMARY

WSP conducted a visual inspection of BSA-B on December 15, 2023. The inspection considered cover conditions, exterior slope conditions, erosional conditions, vegetative conditions, stormwater management conditions, placement of CCRs, slope stability, and any other signs of distress or malfunction.

CHANGES IN GEOMETRY

The primary changes in the geometry of BSA-B since the past annual inspection are due to the closure construction of the BSA-B and the relocation of materials from the western portion of the Phase I footprint to the closed BSA-B. Closure construction entailed the construction of bench ditches, stormwater management features, and geomembrane capping of CCRs. A recent aerial photograph of BSA-B (dated June 2023) is provided on Figure 2.



Figure 2: Aerial Photograph (Google Earth¹)

APPROXIMATE CCR VOLUME

The volume of materials in BSA-B at the time of the inspection is estimated to be approximately 1.8 million cubic yards based on the closure design and survey data.

STRUCTURAL WEAKNESS AND DISRUPTING CONDITIONS

No indications of actual or potential structural weakness were noted during the December 15, 2023 inspection or during the review of available information.

¹ Googe Earth Pro, 30°26'36.51"N, 81°32'18.14"W, image dated June 2023, http://www.google.com/earth/index.html, assessed December 26, 2023.



CHANGES AFFECTING STABILITY OR OPERATIONS

Based on the December 15, 2023 inspection and review of available information, no changes from the previous inspection (conducted on December 15, 2022) that may affect the operations or stability of BSA-B were observed. Operations of the BSA-B have ceased, and closure construction is complete.

CLOSING

Based on the review of the available information noted above and, on the December 15, 2023 field observations, WSP concludes that the design, construction, operation, and maintenance of BSA-B appear to be consistent with recognized and generally accepted good engineering standards.

WSP USA Inc.

Samuel F. Stafford, PE Lead Consultant Donald J. Miller Senior Vice President

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